

**Amendments to the Drawings:**

The attached replacement drawing sheet makes changes to Fig. 3 and replaces the original sheet with Fig. 3.

Attachment: Replacement Sheet

**REMARKS**

Claims 1-23 are pending in this application, claims 9-16 having been withdrawn from consideration. By this Amendment, claims 1-3, 5, 6, 8-13 and 15 are amended and new claims 17-23 are added. Support for the amendments to claims 1-3, 5, 6, 8-13 and 15 and support for new claims 17-23 can be found in the specification as originally filed, for example, in paragraphs [0012], [0013], [0018], [0040], [0036], [0037], [0040], [0041], [0044], [0048], [0051], [0053], [0057], [0058], [0064] and [0066]; in original Figs. 1, 3, and 4A-D; and in original claims 1-16. Also by this Amendment, Fig. 3 is amended. Support for the amendment to Fig. 3 can be found in the specification as originally filed, for example, in paragraphs [0034]-[0044]; and in original Fig. 3. No new matter is added by these amendments.

**I. Objections to the Drawings**

The Office Action objects to the Fig. 3 as failing to comply with 37 C.F.R. §1.84(p)(5) because reference character 10 is not included in the description. Fig. 3 has been amended herein to remove reference character 10.

The Office Action also objects to the drawings under 37 C.F.R. §1.83(a) as not showing every feature of the invention specified in the claims, because the "compartments" of claim 5 are not shown. Claim 5 is amended herein to remove the "compartments" and to set forth "each of the light-emitting layers being separated by a bank, and the electron injection layer being formed by injecting liquid material on the light-emitting layers surrounded by the banks," which are described in the specification and shown, for example, in Figs. 3 and 4A-D.

For at least the above reasons, reconsideration and withdrawal of the objections to the drawings are respectfully requested.

## II. Claim Rejections Under 35 U.S.C. §102

The Office Action rejects claims 1-3 and 6-8 under 35 U.S.C. §102(b) over U.S. Patent No. 6,461,899 to Kitakado et al. Applicant respectfully traverses this rejection.

Independent claim 1 sets forth a "method of producing an electroluminescence apparatus, comprising: forming a plurality of light-emitting layers that emit light with different colors; forming an electron injection layer containing a metal quinolinole complex, such that the electron injection layer is in contact with at least one of the plurality of the light-emitting layers; and forming a layer capable of reducing a metal in the metal quinolinole complex, such that the layer is in contact with the electron injection layer." Claims 2, 3 and 6-8 depend, directly or indirectly, from claim 1 and include all of the limitations thereof.

Kitakado teaches methods of producing electroluminescence apparatuses in which multiple light-emitting layers that emit different colors of light are formed, an electron injection layer containing an organic metal compound is formed in contact with the light-emitting layers. *See* Kitakado, col. 27, line 15 - col. 29, line 59. Based on these teachings, the Office Action takes the position that Kitakado teaches all of the features of independent claim 1 and its dependent claims 2, 3 and 6-8. Applicants respectfully disagree.

Independent claim 1 sets forth a step of "forming an electron injection layer containing a metal quinolinole complex." Kitakado teaches that its electron injection layer is formed from potassium acetylacetonate. *See* Kitakado, col. 29, lines 47-48. However, potassium acetylacetonate is not a metal quinolinole complex, as set forth in claim 1, and Kitakado does not teach any alternatives to potassium acetylacetonate for forming its electron injection layer. Thus, Kitakado does not teach, in discrete embodiments, a method of producing an electroluminescence apparatus including a step of "forming an electron injection layer containing a metal quinolinole complex," as set forth in independent claim 1.

Thus, independent claim 1 and its dependent claims 2, 3 and 6-8 are patentable over the teachings of Kitakado. Accordingly, reconsideration and withdrawal of the rejection is respectfully requested.

### **III. Claim Rejections Under 35 U.S.C. §103**

The Office Action rejects claims 4 and 5 under 35 U.S.C. §103(a) over U.S. Patent No. 6,461,899 to Kitakado et al. in view of U.S. Patent No. 6,821,649 to Kambe et al. Applicant respectfully traverses this rejection.

Independent claim 1 is as set forth above. Claims 4 and 5 depend from claim 1 and incorporate all of the limitations thereof.

As discussed above with respect to claim 1, Kitakado does not disclose, nor does it suggest, a method of producing an electroluminescence apparatus including a step of "forming an electron injection layer containing a metal quinolinole complex as set forth in independent claim 1. Kambe does not remedy the shortcomings of Kitakado.

Kambe teaches methods for producing electroluminescence apparatuses including forming electron injection layers containing organic metal complexes. *See* Kambe, col. 8, lines 30-67. While Kambe discloses a broad range of organic ligands, including acetylacetones and quinolinols, that can be used in such organic metal complexes, Kambe does not provide any motivation to use metal quinolinole complexes to form electron injecting layers. *See generally* Kambe. Rather, Kambe teaches a preference for  $\beta$ -diketones, such as the acetylacetone of Kitakado, over quinolinole complexes. *See* Kambe, col. 8, lines 60-67. Thus, Kambe does not provide any motivation to modify the method of Kitakado to form electron injecting layers containing metal quinolinole complexes instead of the potassium acetylacetonate taught by Kitakado. Rather, both references teach the preferred use of  $\beta$ -diketones, and do not provide any motivation for using other compounds such as the metal quinolinole complexes as claimed.

For at least these reasons, claims 4 and 5 are patentable over Kitakado in view of Kambe. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

#### **IV. New Claims**

By this Amendment, new claims 17-23 are added. Independent claim 17 sets forth a "method of producing an electroluminescence apparatus, comprising forming a light-emitting layer that emits red light, forming a light-emitting layer that emits green light, forming a light-emitting layer that emits blue light, and forming a layer containing an organic metal compound to contact only the layer that emits blue light." Claims 18-23 depend, directly or indirectly from claim 17, and include all of the limitations thereof.

No combination of Kitakado and Kambe teaches or suggests all of the features of independent claim 17. The Kitakado and Kambe references both disclose contacting electron injection layer with light-emitting layers, but do not suggest contacting an electron injection layer only with the light-emitting layer that emits blue light, as required by claim 17. *See generally* Kitakado; Kambe. Because neither Kitakado nor Kambe disclose or suggest this feature of independent claim 17, claim 17 and its dependent claims are patentable over the cited references. Favorable consideration and allowance are thus respectfully requested.

#### **V. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-23 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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